III. REMARKS

Claims 1-20 are pending in this application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 3, 10 and 16 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants gratefully appreciate this indication. However, applicants submit that such a rewriting is not necessary because those dependent claims are believed allowable both for their allowable base claims, as shown below, and for their own additional allowable features.

In the Office Action, claims 1-2, 4-9, 11-15 and 17-20 are rejected under 35 U.S.C. 102(e) as being anticipated by Soudier (US Publication No. 2002/0193978). Applicants respectfully traverse this rejection for the reasons stated below.

With respect to claims 1, 8 and 15, for example, Applicants submit that Soudier does not disclose, *inter alia*, "generating an intermediate model by partitioning the IC into a plurality of simulation windows having a substantially similar characteristic[,]" as recited in claim 1 and claimed similarly in claims 8 and 15. Soudier discloses "[a] computer program product for simulating the performance of an electrical power system." (Abstract). Specifically, in Soudier, "[t]he Simulink™ power blockset contains pre-configured blocks representing common components and devices found in electrical power networks." Soudier has three models to combine those blocks in a simulation, i.e., a combined model, a stand-alone model and a grid-only model. The "windows" disclosed in Soudier are all ordinary user interfaces to communicate with a user and for the user to select simulation paramcters. For example, "input module

configuration choice window 700 [is used] to select one of the three model configurations for simulation" (Para. 0046), and "[t]he principal window 800 provides an end user with a summary view of current simulation parameters." (Para. 0063). The above disclosures of Soudier illustrate its deficiencies as described below.

First, Soudier does not disclose, *inter alia*, "partitioning the IC into a plurality of simulation windows having a substantially similar characteristic[.]" In Soudier, various components of an electrical power system can be represented by various blocks. However, each of those blocks (components) has a different characteristic. For example, an inverter is different than a transformer (FIG. 1 of Soudier). In sharp contrast, the claimed invention partitions the IC into a plurality of simulation windows having a substantially similar characteristic. In addition, Soudier does not include the feature of a simulation window. The "windows" in Soudier are ordinary user interfaces, which are different than the "simulation window" used in the claimed invention. Please note, in the claimed invention, a simulation window is a portion of an IC.

Second, Soudier does not disclose, *inter alia*, generating an intermediate model. A user of Soudier can only select the pre-defined blocks (of the Simulink™ power blockset) and the parameters of the blocks to represent an electrical power system. For example, if an electrical power system includes a component A, a simulation user must choose the block that represents component A. A user of Soudier may choose to simulate only a portion of the electrical power system, e.g., using the stand-alone model, however, in so doing, the user cannot obtain a simulation of the whole electrical power system. That is, Soudier does not include generating an intermediate model of the electrical power system to be simulated. In sharp contrast, the claimed invention include, *inter alia*, generating an intermediate model.

With further regard to claims 1, 8 and 15, Soudier does not disclose, *inter alia*, "converting I/Os within each simulation window to a current source" and "generating the equivalent model for at least one simulation window based on an observed current change rate of the simulation window during a simulation." Applicants respectfully submit that Soudier does not disclose anything that is marginally relevant to the above features. Soudier discloses "selecting a power source" (Para. 0064), however, the power source is a part of the electrical power system to be simulated (see FIG. 1). Soudier uses blocks to represent the power source, but does not convert I/Os within each simulation window to a current source. Actually, Soudier does not disclose converting I/Os to anything because an electrical power system of Soudier does not includes I/Os that are used in an IC. The Office asserts, citing totally 76 paragraphs of Soudier (Paras. 0063 – 0139), that Soudier includes the above features. (Office Action at page 3). Applicants carefully reviewed the citations and do not find any support for the above assertions of the Office. Applicants respectfully request that the Office provide specific citations to support its assertions.

In view of the foregoing, Applicants respectfully submit that Soudier does not anticipate the claimed invention. Accordingly, Applicants request withdrawal of the rejections.

The dependent claims are believed allowable for the same reasons stated above, as well as for their own additional features.

IV. CONCLUSIONS

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

Spencer K. Warnick
Reg. No. 40,398

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Hoffman, Warnick & D'Alessandro LLC
75 State Street, 14th Floor
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)